

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: AFTERMARKET FILTERS  
ANTITRUST LITIGATION**

**Master Docket No. 08-cv-4883  
MDL Docket No. 1957**

**This Document Relates To:  
All Gas Retailers' Indirect Purchaser  
Actions**

**Honorable Robert W. Gettleman  
Magistrate Judge Geraldine Soat Brown**

**GAS RETAILERS' INDIRECT PURCHASER SETTLEMENT CLASS MOTION TO  
REVISE THE COURT'S ORDER PRELIMINARILY APPROVING THE GAS  
RETAILERS' INDIRECT PURCHASER CLASS SETTLEMENT**

NOW COME, the Gas Retailers' Indirect Purchaser Plaintiffs (hereafter "Gas Retailers") by and through co-lead counsel and move the Court for an order modifying the Order preliminarily approving the Gas Retailers' Class Settlement (Document No. 941) entered by the Court on April 20, 2012. In particular, this Motion seeks an order from the Court authorizing a new mailing of a revised long-form mail notice to be made to the Gas Retailer's class members by first-class mail within seven (7) days of the entry of the requested order, for the Court to establish new deadlines for Gas Retailers' class members to exclude themselves from the Settlement Class or otherwise object to the Settlements, the Plan of Distribution and Allocation, the application by Class Counsel for an award of attorneys' fees, reimbursement of litigation expenses and Plaintiffs' incentive awards, and to establish a new date for the final fairness hearing relating solely to the Gas Retailers' class settlement.

In support of this motion, the Gas Retailers' file contemporaneously herewith their Memorandum in support of this motion.

WHEREFORE, the Gas Retailers' Class Plaintiffs move the Court for an order amending the preliminary approval order relating to the Gas Retailers' class settlement (Document No. 941) to authorize another mailing of a revised long-form mail notice by first-class mail to all Gas Retailers' Class Members that class counsel have identified; to establish a new deadline for Class Members to exclude themselves from the Settlement Class or to otherwise object to the Settlements, the Plan of Distribution and Allocation, the application by Class Counsel for an award of attorneys' fees, reimbursement of litigation expenses and Plaintiffs' incentive awards and to establish a new date for a hearing before this Court for final approval of the Gas Retailers' class settlement; and for such other and further relief as the Court deems just and equitable in the premises.

Dated: September 19, 2012

Respectfully submitted,

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